Los Angeles County Sheriff's Department

Supervisor's Report on Use of Force

Incident Information

URN: 920-03161-1133-145	Date: 02/13/2020	Time: 1951	
Location: Avenue J and Sancroft Avenue		City or Station: Lancaster	
Bureau/Station/Facility: North Patrol Division / Lancaster Station		Admin. Investigation: ○ YES ◉ NO	
Type of Force: Control Holds / Resisted Handcuffing			
Incident Category: ○1 ○2 ◉3	Deputy Injury: ○ YES ◉ NO	Suspect Injury ◉ YES ○ NO	
☐ Call	☒ Observation	☐ Detail	☐ Foot Pursuit ☐ Vehicle Pursuit
IAB Notified: ◉YES ○ NO	Person Notified: A/Lt. Hank Ortega	Emp: [redacted]	IAB Roll Out ◉ YES ○ NO

Involved Employee

E1

Employee #: [redacted]	Last Name: [redacted]	First Name: [redacted]	Middle I. [redacted]	Rank: DSG	
Sex: ◉ M ○ F	Race: W	Height: 5'09"	Weight: 180	Age: [redacted]	Shift: ○ EM ○ Day ◉ PM — ◉ Regular Shift ○ OT Shift ○ Off Duty
Unit of Assignment: Lancaster Station			Work Assignment (Unit #, Module, etc.): 112A		
Individual Force Used: Control Holds			○ Directed ○ Rescue ○ Medical Assist	Individual Category ◉1 ○2 ○3	
☐ Injured ☐ Treated ☐ Admitted Facility:				Coroner Case #	

E_

Employee #: [redacted]	Last Name: Garay	First Name: Robert	Middle I. A.	Rank: DSG	
Sex: ◉ M ○ F	Race: H	Height: 5'10"	Weight: 180	Age: [redacted]	Shift: ○ EM ○ Day ◉ PM — ◉ Regular Shift ○ OT Shift ○ Off Duty
Unit of Assignment: Lancaster Station			Work Assignment (Unit #, Module, etc.): 112A		
Individual Force Used: Control Holds / Resisted Handcuffing			○ Directed ○ Rescue ○ Medical Assist	Individual Category ○1 ○2 ◉3	
☐ Injured ☐ Treated ☐ Admitted Facility:				Coroner Case #	

E_

Employee #	Last Name	First Name	Middle I.	Rank	
Sex: ○ M ○ F	Race:	Height:	Weight:	Age:	Shift: ○ EM ○ Day ○ PM — ○ Regular Shift ○ OT Shift ○ Off Duty
Unit of Assignment:			Work Assignment (Unit #, Module, etc.):		
Individual Force Used:			○ Directed ○ Rescue ○ Medical Assist	Individual Category ○1 ○2 ○3	
☐ Injured ☐ Treated ☐ Admitted Facility:				Coroner Case #	

On Duty Supervisor ☐ Additional Involved Employees

Emp #	Last Name	First Name	Middle I.	Rank	Present	Witness to Incident
[redacted]	Marion	Clayton	D.	SGT	YES ○ NO ◉	YES ○ NO ◉

Supervisor Completing Investigation

Emp #	Last Name	First Name	Middle I.	Rank	Present	Witness to Incident
[redacted]	Carr	Dustin	A.	SGT	YES ○ NO ◉	YES ○ NO ◉

Watch Commander / Supervising Lieutenant

Emp #	Last Name	First Name	Middle I.	Rank
[redacted]	Mouat	Chris	J.	LT

[signature] 9/9/20

Watch Commander / Supervising Lieutenant's **Signature**: Date

Copy Provided to Employee by: [redacted] Emp #:

William Jaeger [signature] 9/11/20

Unit Commander **(Print Name)** Unit Commander's **Signature**: Emp #: Date

DISCOVERY Use Only

FO#

☐ PPI REVIEW COMPLETED

Original: Discovery Unit
Copy: Unit Commander

SH-R-438P (Rev. 01/13)

Supervisor's Report on Use of Force
SUSPECT INFORMATION

9 2 0 - 0 3 1 6 1 - 1 1 3 3 - 1 4 5

Suspect Information

S 1

Last Name: Stults | First Name: Laurence | Middle Name: Ervon | Armed? Select: Not Armed

AKA Last Name: | First Name: | Middle Name:

Sex: (●) Male ( ) Female | Race: W | Age: 42 | Height: 5'10" | Weight: 165 | D.O.B: 07/06/77 | Phone #1: ( ) H ( ) W (●) C [redacted] | Phone #2: ( ) H ( ) W ( ) C [redacted]

Street Address: [redacted] | City: [redacted] | State & Zip Code: [redacted]

Booking #: 5874562 | Primary Charge Code: 148(a)(1) P.C. | Secondary Charge Code: 11377(a) H.S. | [redacted] Criminal History

Treated on Scene? ( ) YES (●) NO | Name: | Unit: | Phone #:

Hospital Admission? ☐ | Rec'd Treatment At: Antelop Valley Hospital | Coroner Case #: | Mental History ☐ User's guide provides direction on this entry

By: Ashkon Ansari, M.D. | Address: 1600 West Avenue J, Lancaster 93534 | Phone #: 661-949-5000

Under Influence: (●) YES ( ) NO | Substance: CNS Stimulant | 5150 a factor in force? ( ) YES (●) NO User's guide provides direction on this entry

Suspect Interview

Date: 02/14/2020 | Time: 0626 | ☒ Audiotape: | ☒ Videotape: | ☒ Photos of Injuries: | ☐ ADMITS HEARING ANNOUNCEMENTS

Suspect Information

S__

Last Name: | First Name: | Middle Name: | Armed? Select:

AKA Last Name: | First Name: | Middle Name:

Sex: ( ) Male ( ) Female | Race: | Age: | Height: | D.O.B. | Weight: | Phone #1: ( ) H ( ) W ( ) C | Phone #2: ( ) H ( ) W ( ) C

Street Address: | City: | State & Zip Code:

Booking #: | Primary Charge Code: | Secondary Charge Code: | ☐ Criminal History

Treated on Scene? ( ) YES ( ) NO | By: | Unit: | Phone #:

Hospital Admission? ☐ | Rec'd Treatment At: | Coroner Case #: | Mental History ☐ User's guide provides direction on this entry

By: | Address: | Phone #:

Under Influence: ( ) YES ( ) NO | Substance: | 5150 a factor in force? ( ) YES ( ) NO User's guide provides direction on this entry

Suspect Interview

Date: | Time: | ☐ Audiotape: | ☐ Videotape: | ☐ Photos of Injuries: | ☐ ADMITS HEARING ANNOUNCEMENTS

Suspect Information

S__

Last Name: | First Name: | Middle Name: | Armed? Select:

AKA Last Name: | First Name: | Middle Name:

Sex: ( ) Male ( ) Female | Race: | Age: | Height: | D.O.B. | Weight: | Phone #1: ( ) H ( ) W ( ) C | Phone #2: ( ) H ( ) W ( ) C

Street Address: | City: | State & Zip Code:

Booking #: | Primary Charge Code: | Secondary Charge Code: | ☐ Criminal History

Treated on Scene? ( ) YES ( ) NO | By: | Unit: | Phone #:

Hospital Admission? ☐ | Rec'd Treatment At: | Coroner Case #: | Mental History ☐ User's guide provides direction on this entry

By: | Address: | Phone #:

Under Influence: ( ) YES ( ) NO | Substance: | 5150 a factor in force? ( ) YES ( ) NO User's guide provides direction on this entry

Suspect Interview

Date: | Time: | ☐ Audiotape: | ☐ Videotape: | ☐ Photos of Injuries: | ☐ ADMITS HEARING ANNOUNCEMENTS

☐ Additional Suspects Involved

Supervisor's Report on Use of Force
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Method

(AW) Arwen
(BC) Baton: (Control)
(BI) Baton: (Impact)
(BF) Bodily Fluids
(CN) Canine
(CR) Carotid Restraint
(CH) Choke Hold
(CT) Control Holds: (Control Techniques)
(TT) Control Holds: (Team Takedown)
(TD) Control Holds: (Takedown)
(CE) Chemical
(OC) Chemical Agents (OC Spray)
(TG) Chemical Agents (Tear Gas)
(EX) Explosives
(FH) Firearm (Handgun)
(FR) Firearm (Rifle)
(FS) Firearm (Shotgun)
(FO) Firearm (Other)
(FB) Flashbang
(FL) Flashlight
(OE) Other Weapon: Edged
(OV) Other Weapon: Vehicle
(OB) Other Weapon: Blunt Object
(OO) Other Weapon: Other
(PK) Personal Weapon: Feet/Leg: (Kick)
(PS) Personal Weapon: Feet/Leg: (Sweep)
(PH) Personal Weapon (Hand/Arm)
(PP Personal Weapon (Push)
(PO) Personal Weapon (Other)
(RS) Resistance
(RO) Restraint Device (Other)
(RH) Restraint Device (Handcuffs)
(HB) Restraint Device: Hobble (Legs Only)
(TP) Restraint Device: Hobble (TARP)
(RE) Restraint Device: REACT Belt
(SP) Sap
(SH) Shield
(IR) Less Lethal Impact Round (other)
(SB) Sting Ball
(ST) Stun Bag
(TR) Taser
(UC) Uncooperative
(HR) High Risk

Type of Injury

(AB) Abrasion
(BR) Bruise
(BU) Burn
(CP) Complaint of Pain
(CO) Concussion
(DH) Death
(DI) Dislocation
(DB) Dog Bite
(FR) Fractures
(GS) Gunshot
(HB) Human Bite
(LC) Lacerations
(ND) Nerve Damage
(OD) Organ Damage
(PA) Paralysis
(PW) Puncture Wound
(SD) Soft Tissue Damage
(ST) Sprain/Twists
(UN) Unconscious
(RM) Refused Med Treatment
(NN) NONE

Body Part Involved

(AD) Abdomen
(AK) Ankle
(AR) Arm
(BK) Back
(BT) Buttocks
(CH) Chest
(EL) Elbow
(FA) Face
(FE) Feet
(FI) Fingers
(GE) Genitals
(GR) Groin
(HD) Hands
(HE) Head
(HI) Hip
(IN) Internal
(KN) Knees
(LE) Leg
(NK) Neck
(NO) Nose
(SH) Shoulder
(WR) Wrist

FORCE USED BY		FORCE USED AGAINST		Method (Code)	Type of Injury (Code)	Body Part (Code)
Name	E# or S#	Name	E# or S#			
Stults	S#1	[redacted]	E#1	HR	NN	NN
Stults	S#1	Garay	E#2	HR	NN	NN
Stults	S#1	[redacted]	E#1	RS	NN	AR
Stults	S#1	Garay	E#2	RS	NN	AR
[redacted]	E#1	Stults	S#1	CT	NN	AR
[redacted]	E#1	Stults	S#1	CT	NN	SH
Garay	E#2	Stults	S#1	CT	FR	BK
Garay	E#2	Stults	S#1	CT	NN	AR
Garay	E#2	Stults	S#1	RH	NN	WR

COUNTY OF LOS ANGELES
SHERIFF'S DEPARTMENT

INVESTIGATIVE SUMMARY

INCIDENT: **Category 3 Use of Force, Fractured Rib**

IAB FILE NUMBER: **FO 2503933**

URN#: **920-03161-1133-145**

DATE/TIME: **February 13, 2020 / 1951 Hours**

LOCATION: **Avenue J and Sancroft Avenue, Lancaster**

SYNOPSIS:

On February 13, 2020, Deputies [redacted] and Robert Garay detained Suspect Laurence Stults after he fled from an attempted bicycle stop. Deputies [redacted] and Garay used control holds and resisted handcuffing to take Suspect Stults into custody. Suspect Stults was diagnosed with a fractured right rib after the incident.

SUMMARY:

On February 13, 2020, Deputies [redacted] and Garay were working together as Unit 112A. While driving north on Andale Avenue, they saw Suspect Stults riding his bicycle south on the west curb of Andale Avenue, just north of Ovington Street. The deputies noticed the bicyclist did not have any lights or reflectors while riding, at 1950 hours, during the night. They attempted an enforcement stop on Suspect Stults just before he descended the apron of the curb at the intersection of Andale Avenue and Ovington Street. Deputy [redacted] the driver, turned the patrol vehicle and stopped, and positioned the vehicle's hood just before the concrete gutter in the intersection of Andale Avenue and Ovington Street.

Suspect Stults descended the apron of the curb, maneuvered his bicycle around the front of the patrol vehicle, and crossed Andale Avenue to the east curb line. He continued riding south on the east side of Andale Avenue. Deputy [redacted] used the intersection of Andale Avenue and Ovington Street to complete a U-turn and drove south on Andale Avenue. Suspect Stults pedaled faster and increased his speed.

Deputies [redacted] and Garay activated their front forward facing red and blue lights on their patrol car, and intermittently used the siren, as they approached Suspect Stults. Suspect Stults slowed his bicycle by dragging his feet on the ground. Deputies [redacted] and Garay stopped behind Suspect Stults and exited the patrol vehicle, believing Suspect Stults was going to stop. Suspect Stults again began to rapidly pedal, riding south on Andale Avenue toward Avenue J.

Suspect Stults rode diagonally across the Avenue J frontage road and subsequently Avenue J. As he rode across the lanes of traffic on Avenue J, several drivers had to slam on their brakes to avoid a collision with Suspect Stults. Deputies [redacted] and Garay entered their patrol vehicle and followed Suspect Stults; the red and blue emergency lights atop their patrol vehicle remained activated. They crossed all lanes of traffic, intermittently using the "wail" feature of their siren to alert oncoming traffic. They continued to drive west in the eastbound number two lane of Avenue J.

Deputies [redacted] and Garay caught up to Suspect Stults on Avenue J, as he rode west on the south curb. Suspect Stults stopped, abandoned his bicycle, and walked east. Deputy [redacted] stopped the patrol vehicle and both deputies exited. They ordered Suspect Stults to stop and Deputy [redacted] ordered Suspect Stults to lie on the ground. Suspect Stults complied and voluntarily lied face down on the curb, placing his hands underneath his body. Deputy Garay knelt next to Suspect Stults' right side, and placed his left knee across Suspect Stults' lower back. Deputy [redacted] knelt down on Suspect Stults' left side and placed his right shin on Suspect Stults' left shoulder. Suspect Stults did not follow orders given by Deputies [redacted] and Garay to place his hands behind his back. Deputy Garay pulled Suspect Stults' right arm behind his back and handcuffed his right wrist. Deputy Garay warned Suspect Stults he would use the Taser on him if he did not place his left hand behind his back. Suspect Stults complied and voluntarily placed his left hand behind his back. Deputy Garay handcuffed Suspect Stults' left wrist. Suspect Stults was subsequently helped up and escorted to a patrol vehicle. Deputy [redacted] recovered a clear plastic baggie containing suspected methamphetamine from Suspect Stults' right front pants pocket.

Suspect Stults was taken for medical treatment at Antelope Valley Hospital. He was diagnosed with a fracture to his 11th right rib. Internal Affairs Bureau (IAB) Acting Lieutenant Hank Ortega, #[redacted] was notified and responded. IAB Sergeants Dustin Carr and Adrian Guillen, #[redacted] also responded and collected all relevant reports, documented under Uniform Report Number 920-03161-1133-145 **[EXHIBIT A].**

INVOLVED EMPLOYEES AND WORK HISTORY

[redacted] **Deputy Sheriff, #**[redacted]
North Patrol Division – Lancaster Station

Work History
Date of Employment: January 29, 2014
Date Assigned to Lancaster Station: May 7, 2017
Date Completed Patrol Training: [redacted]
Prior Founded Force Incident(s):

Equipment Worn On Person
Duty Weapon
Oleoresin Capsicum (OC) Spray
Expandable Baton
Handcuffs
Portable Radio

Robert Garay, Deputy Sheriff, #[redacted]
North Patrol Division – Lancaster Station

Work History
Date of Employment: July 25, 2012
Date Assigned to Lancaster Station: May 1, 2016
Date Completed Patrol Training: [redacted]
Prior Founded Force Incident(s):

Equipment Worn On Person
Duty Weapon
Oleoresin Capsicum (OC) Spray
Expandable Baton
Handcuffs
Portable Radio
Sap
Taser

SUSPECT INFORMATION

Laurence Ervon Stults
Male, White, DOB: 07-06-1977, 5'10", 165 pounds
[redacted]
CII #[redacted] MAIN #[redacted] FBI #[redacted]

The report from Consolidated Criminal History Reporting System (CCHRS) **[Miscellaneous Documents]** showed Suspect Stults was [redacted]

WITNESSES

Employee Witness

None.

Non-Employee Witness

None.

SUSPECT'S INJURIES

Suspect Laurence Stults

Suspect Stults sustained a fracture to his 11th right rib and pain to the right side of his body. He signed a release allowing the assigned IAB investigator to obtain his medical records from Antelope Valley Hospital. His medical records were submitted **[EXHIBIT B]**. The assigned IAB investigator photographed Suspect Stults' injuries and alleged injuries. The photographs were placed on a DVD-R in the file labeled "Suspect Stults' Photos" **[EXHIBIT C]**.

The assigned IAB investigator attempted to contact Dr. Ashkon Ansari, both in person and over the phone. He was Suspect Stults' medical provider. Dr. Ansari was not at the hospital when the assigned IAB investigator arrived. The assigned IAB investigator attempted to contact Dr. Ansari via telephone twice. The hospital personnel answering the phone would not release Dr. Ansari's schedule. On August 11, 2020, the assigned IAB investigator sent Dr. Ansari a certified letter requesting his statement **[Miscellaneous Documents]**. Dr. Ansari did not contact the assigned IAB investigator.

No Department personnel were injured during this incident.

DEPUTY PERSONNEL INJURIES

No deputy personnel were injured during the incident.

PHYSICAL EVIDENCE

A clear plastic baggie containing methamphetamine was recovered by Deputy [redacted] from Suspect Stults' right front pants pocket.

INVESTIGATOR'S OBSERVATIONS

Approximately eight hours elapsed between the time of the incident and the time of the assigned IAB investigator's observations. The area where the use of force occurred was a concrete curb and gutter on the south side of a city street. The street was lined with residential neighborhoods on the north and south side. A frontage road separated the city street to the south. An approximate five-foot high cinderblock wall separated the south side of Avenue J from a residential neighborhood to the south.

SURVEILLANCE VIDEO AND PHOTOGRAPHS

IAB investigators returned to the scene of the incident and took photographs. IAB Investigators also contacted [redacted] at [redacted] in [redacted] His residence is [redacted] to the [redacted] of where the incident occurred. He provided IAB investigators with surveillance video from his home. The surveillance video and photographs were in **EXHIBIT C** under the files "Incident Video" and "Scene Photos," respectively.

> **IAB NOTE: [redacted] told IAB investigators neither he, nor anyone else living at his residence, witnessed the incident.**

The videos [redacted] provided show two vantages from his surveillance video; both captured the incident. They are labeled "Driveway" and "Front Door." The following is a summary of significant events seen on the videos. The time used to signify the events is the timestamp on the videos. [redacted] told IAB investigators the timestamps are accurate.

Driveway

19:51:30 – Suspect Stults appeared on video riding his bicycle west on the south curb of Avenue J.

19:51:34 – Deputies [redacted] and Garay's patrol vehicle appeared on video, driving west on the south side of Avenue J.

19:51:37 – Deputies [redacted] and Garay's patrol vehicle paralleled Suspect Stults.

19:51:42 – Deputy Garay exited the patrol vehicle though the front passenger door.

19:51:43 – The patrol vehicle stopped. Deputy Garay walked around the front of the patrol vehicle as Suspect Stults walked east on the south curb of Avenue J. Deputy [redacted] exited the patrol vehicle. Suspect Stults could not be seen on video.

19:51:47 – Suspect Stults lied face down on the ground.

19:51:50 – Deputies Garay and [redacted] knelt down on Suspect Stults' right and left sides, respectively.

19:52:43 – Suspect Stults was helped to his feet.

19:52:46 – Suspect Stults was escorted to the driver's side of the patrol vehicle by Deputies Garay and [redacted]

19:55:59 – Deputy Garay entered the front passenger side of the patrol vehicle.

20:02:58 – The patrol vehicle drove west on Avenue J, off video.

20:03:25 – Deputy [redacted] collected Suspect Stults' bicycle and walked it west, on Avenue J, off video.

Front Door

19:51:27 – Suspect Stults appeared on video riding his bicycle west on the south curb of Avenue J.

19:51:31 – Deputies [redacted] and Garay's patrol vehicle appeared on video, driving west on Avenue J.

19:51:33 – Deputies [redacted] and Garay's patrol vehicle crosses Avenue J to the south side.

19:51:37 – Deputies [redacted] and Garay's patrol vehicle paralleled Suspect Stults.

19:51:42 – Deputy Garay exited the patrol vehicle though the front passenger door.

19:51:43 – The patrol vehicle stopped. Deputy Garay walked around the front of the patrol vehicle as Suspect Stults walked east on the south curb of Avenue J. Deputy [redacted] exited the patrol vehicle. Suspect Stults ran east.

19:51:46 – Suspect Stults stopped.

19:51:47 – Suspect Stults lied face down on the ground.

19:51:50 – Deputies Garay and [redacted] knelt down on Suspect Stults' right and left sides, respectively.

19:52:43 – Suspect Stults was helped to his feet.

19:52:46 – Suspect Stults was escorted to the driver's side of the patrol vehicle by Deputies Garay and [redacted]

19:55:59 – Deputy Garay entered the front passenger side of the patrol vehicle.

19:56:25 – Deputy [redacted] entered the front driver's side of the patrol vehicle.

20:02:58 – The patrol vehicle drove west on Avenue J, off video.

20:03:25 – Deputy [redacted] picked up Suspect Stults' bicycle and walked it west, on Avenue J, off video.

RADIO TRAFFIC

No radio traffic was broadcasted during the incident. Lancaster Station's tactical frequency, L-Tac, was used to advise the dispatcher Suspect Stults was being transported to the jail. The radio broadcast was copied onto one CD-R **[EXHIBIT D]**. The following is a summary of significant radio broadcasts; verbatim terms or phrases are in quotes. The time used to signify the radio traffic is the elapsed interval on the recording, not the time the radio broadcasts occurred.

L-Tac

0:18 – Deputy Garay advised the dispatcher, "110 David," he is transporting an "uncoop" to the jail.

IAB NOTE: The term "uncoop" is used to describe an uncooperative person.

WEAPONS USED BY DEPUTY PERSONNEL

None.

WEAPONS USED BY SUSPECT STULTS

None.

PROPERTY DAMAGE

None.

CRIMINAL INVESTIGATORS AND CHARGES FILED

Suspect Stults was charged with 148(a)(1) P.C., Resisting, Delaying, or Obstructing a Peace Officer; and 11377(a) H.S., Possession of a Controlled Substance under case number 0AN02869. This case is related to this incident. Suspect Stults failed to appear in court and a warrant was issued for his arrest.

Suspect Stults had a [redacted] Suspect Stults also failed to appear in court for this case and a warrant was issued for his arrest.

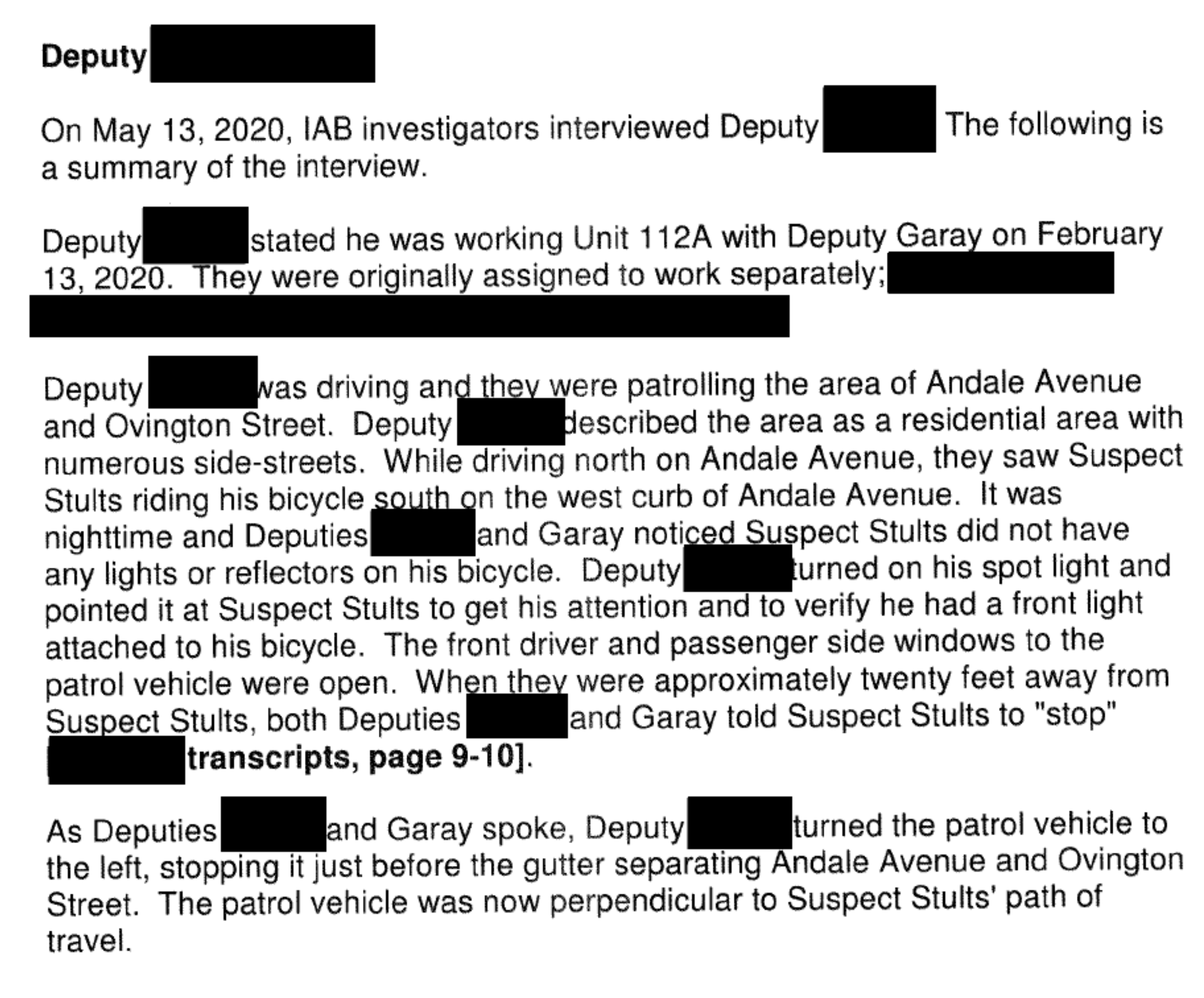
LIGHTING AND WEATHER CONDITIONS

The weather on February, 13, 2020, was clear and the incident occurred during nighttime hours on a city street, at 1951 hours. The street was sparsely illuminated by street lights and the red and blue lights of the patrol vehicle.

INVOLVED EMPLOYEE STATEMENTS

The following narratives are intended only as a synopsis of the interviews. Additional information and precise wording may be obtained by reviewing the digitally audio recorded interviews and verbatim transcriptions.

The photographs referenced during the IAB employee witness interviews and the IAB involved employees' interviews were taken from Google Maps. The interview photographs are combined into one separate exhibit **[EXHIBIT E]**. The photographs presented during these interviews aided in identifying approximate locations of personnel and their observations.



Deputy [redacted]

On May 13, 2020, IAB investigators interviewed Deputy [redacted] The following is a summary of the interview.

Deputy [redacted] stated he was working Unit 112A with Deputy Garay on February 13, 2020. They were originally assigned to work separately; [redacted]

Deputy [redacted] was driving and they were patrolling the area of Andale Avenue and Ovington Street. Deputy [redacted] described the area as a residential area with numerous side-streets. While driving north on Andale Avenue, they saw Suspect Stults riding his bicycle south on the west curb of Andale Avenue. It was nighttime and Deputies [redacted] and Garay noticed Suspect Stults did not have any lights or reflectors on his bicycle. Deputy [redacted] turned on his spot light and pointed it at Suspect Stults to get his attention and to verify he had a front light attached to his bicycle. The front driver and passenger side windows to the patrol vehicle were open. When they were approximately twenty feet away from Suspect Stults, both Deputies [redacted] and Garay told Suspect Stults to "stop" [redacted] **transcripts, page 9-10]**.

As Deputies [redacted] and Garay spoke, Deputy [redacted] turned the patrol vehicle to the left, stopping it just before the gutter separating Andale Avenue and Ovington Street. The patrol vehicle was now perpendicular to Suspect Stults' path of travel.

IAB NOTE: Using a photograph provided during the interview, Deputy [redacted] marked position of the hood of the patrol vehicle with an "X" and the work "OBS" [EXHIBIT E, [redacted] A].

Suspect Stults did not stop and maneuvered around the patrol vehicle. He subsequently rode to the east curb of Andale Avenue. Suspect Stults pedaled faster and increased his speed. Deputy [redacted] completed a U-turn at the intersection of Andale Avenue and Ovington Street, activated the patrol vehicle's red and blue lights, and caught up to Suspect Stults. Deputy [redacted] used the manual activation button to intermittently use the "wail" feature of the siren. He told Suspect Stults, "Hey, stop the bike." Deputy [redacted] believed Suspect Stults could clearly hear him [[redacted] **transcripts, Page 15]**.

Suspect Stults did not appear to have a handbrake on his bicycle and used his feet to slow down. It appeared Suspect Stults was going to stop. Deputy [redacted] stopped the patrol vehicle and he and Deputy Garay exited. Suspect Stults suddenly rode away on his bicycle pedaling fast. Deputies [redacted] and Garay entered their patrol vehicle and followed Suspect Stults. Deputy [redacted] was able to get a good look at Suspect Stults and noticed he was sweating. Deputy [redacted] believed Suspect Stults was sweating too much for the short distance he traveled [[redacted] **transcripts, page 19]**. Deputy [redacted] thought Suspect Stults may have been under the influence of a controlled substance.

Suspect Stults rode south on Andale Avenue then in a southwest direction, crossing the Avenue J frontage road. He continued across Avenue J to the south curb. As he crossed the lanes of traffic on Avenue J, several drivers traveling in both directions slammed their brakes to avoid colliding with Suspect Stults.

IAB NOTE: Using EXHIBIT E, [redacted] A, Deputy [redacted] marked Suspect Stults' route of travel with a line. He marked an "X" where Suspect Stults slowed his bicycle prior to fleeing.

Deputy [redacted] crossed Avenue J and continued using the patrol vehicle's siren to alert oncoming traffic. He was able to safely cross Avenue J, drove west in the number two eastbound lane, and caught up to Suspect Stults. Suspect Stults stopped as Deputies [redacted] and Garay approached. He dismounted his bicycle and walked east on Avenue J. Deputies [redacted] and Garay ordered Suspect Stults to "stop." Suspect Stults complied and stopped. Deputy [redacted] saw Suspect Stults' right hand in his pocket. Deputy [redacted] feared Suspect Stults may have been reaching for a weapon and ordered him to "Lay down on the sidewalk." Suspect Stults again complied; however, he tucked his hands underneath his body [[redacted] **transcripts, page 27]**.

IAB NOTE: Using EXHIBIT E, [redacted] B, Deputy [redacted] drew a rectangle with a point to indicate where he parked the patrol vehicle. He also drew a stick figure to indicate Suspect Stults' position when he lied down on the ground.

Deputy [redacted] was again concerned Suspect Stults may have had a weapon. Suspect Stults wore an untucked shirt that covered his waistband. Suspect Stults was faced down on the sidewalk, faced east. Deputy [redacted] knelt down on Suspect Stults' left side. Deputy [redacted] placed his right shin across Suspect Stults' left shoulder blade. Deputy [redacted] did not use his entire body weight, just enough to prevent Suspect Stults from moving. Deputy [redacted] only remembered Suspect Stults repeating, "I didn't do anything," during the incident [redacted] **transcripts, page 34]**.

Deputy Garay was now on Suspect Stults' right side and placed his left knee on the Suspect Stults' back. Deputy Garay pulled Suspect's Stults upper right arm from underneath his body. Suspect Stults became rigid and tensed his muscles. Deputy [redacted] thought Suspect Stults was trying to conceal or retain a weapon [redacted] **transcripts, page 36]**. Deputy [redacted] continued to watch Suspect Stults and Deputy Garay, making sure Deputy Garay did not lose control of Suspect Stults' arm while at the same time ensuring Suspect Stults did not retrieve a weapon [redacted] **transcripts, page 37]**. Deputy Garay was able to place Suspect Stults' right arm behind his back and handcuffed his right wrist.

Suspect Stults continued to force his left arm underneath his body. Deputy Garay warned Suspect Stults, "If he didn't bring his left hand out, that he was going to tase him." The warning had the "desired result" and Suspect Stults voluntarily placed his left arm behind his back. Deputy Garay handcuffed Suspect Stults' left wrist and they were able to stand him up without further incident [redacted] **transcripts, page 37]**.

Deputy [redacted] stated they did not call for backup or assistance as the incident was very brief. Suspect Stults appeared to initially comply before he fled on Andale Avenue. He complied again, when Deputy [redacted] gave him orders to stop on Avenue J, after he fled [redacted] **transcripts, page 18]**.

Suspect Stults did not complain of pain during or after the incident. Suspect Stults did not appear injured.

Sergeant Clayton Marion, #[redacted], responded to the scene and they debriefed the incident. During the debriefing, they discussed the incident from start to finish and no tactical concerns were mentioned [redacted] **trasnscripts, page 44]**. Since Suspect Stults did not report any injuries or complaint of pain on scene, Deputies [redacted] and Garay transported Suspect Stults to Lancaster

Station. No personnel conducted field sobriety tests on Suspect Stults to determine if he was under the influence of a controlled substance.

Deputy [redacted] was read the video admonishment and shown the "Front Door" video on **[EXHIBIT C]**. After reviewing the video, Deputy [redacted] noticed he was paralleling Suspect Stults for a short period of time while traveling west on Avenue J.

In a follow-up interview on May 13, 2020, Deputy [redacted] stated neither himself nor Deputy Garay repeatedly struck Suspect Stults with their knee.

Deputy Robert Garay

On May 13, 2020, IAB investigators interviewed Deputy Garay. The following is summary of the interview.

Deputies Garay and [redacted] were working together as Unit 112A on February 13, 2020. They originally were supposed to work as separate units; [redacted]

While driving north on Andale Avenue, they saw Suspect Stults riding a bicycle, south on the west curb of Andale Avenue. It was nighttime and he did not have a front light on his bicycle or a rear red reflector. As Suspect Stults approached Ovington Street, Deputy [redacted] used the spotlight of their patrol vehicle to illuminate Suspect Stults and told him, "Hey, we are trying to contact you," through the patrol vehicle's open driver's side window **[Garay's transcripts, page 8]**. Deputy Garay believed Suspect Stults heard Deputy [redacted] as there was no noise in the vicinity. Deputy [redacted] subsequently turned the patrol vehicle to face west toward Ovington Street. Their patrol vehicle was not completely in Suspect Stults' path. Suspect Stults did not stop. He rode around the hood of their patrol vehicle and continued riding south; he appeared to be traveling faster than when Deputy Garay first saw him. Deputy Garay did not see Suspect Stults cross Andale Avenue, but believed he rode closer to the east side of the street.

Deputy Garay turned the patrol vehicle's lights on as Deputy [redacted] negotiated a U-turn. Deputy Garay used either the air horn feature or the wail feature on the siren as Deputy [redacted] caught up to Suspect Stults. Suspect Stults appeared to be slowing to a stop. Deputy [redacted] stopped the patrol vehicle just south of Pondera Street. Both deputies exited the patrol vehicle, believing Suspect Stults was going to stop. As they exited, Suspect Stults rode away, south on Andale Avenue toward Avenue J. Suspect Stults subsequently turned west onto Avenue J. Deputy Garay believed Suspect Stults may have been carrying a weapon based on him fleeing **[Garay's transcripts, page 17]**.

Deputies [redacted] and Garay entered the patrol vehicle and followed Suspect Stults. They discussed setting up a containment if Suspect Stults fled. The conversation was brief. Deputy [redacted] drove across Avenue J. It took some time to cross the street because traffic was busy **[Garay's transcripts, page 19]**. Deputy Garay believed the drivers on Avenue J noticed their patrol vehicle's lights as traffic slowed, allowing them to cross. Deputy [redacted] drove west in the number two eastbound lane of Avenue J, caught up to Suspect Stults, and told him to stop.

IAB NOTE: Using EXHIBIT E, Garay A, Deputy Garay marked the location they initially tried to contact Suspect Stults with and "X" and the word "Obs." He drew Suspect Stults' route with a solid red line.

Suspect Stults stopped, "dropped his bike," and began to walk east. Deputy [redacted] stopped the patrol vehicle in the bus stop inlet. They exited their patrol vehicle as Suspect Stults walked away. Suspect Stults had his right hand in this waistband and Deputy Garay feared Suspect Stults may have had a weapon. Deputy [redacted] ordered Suspect Stults to take his hands away from his waistband. Suspect Stults complied and laid down on the ground, with his hands underneath his body.

IAB NOTE: Using EXHIBIT E, Garay B, Deputy Garay marked the approximate place their patrol vehicle was parked with an oval. He marked the place Suspect Stults laid on the ground with an "X" surrounded by a circle.

Deputy Garay did not know if Suspect Stults was going to reach for a weapon. Deputy [redacted] approached Suspect Stults' left side and Deputy Garay approached Suspect Stults' right side. Deputy Garay placed his left knee across Suspect Stults' lower back to hold Suspect Stults' down. Deputy Garay estimated his used less than half of his body weight when he applied pressure with his left knee.

Deputy Garay used both of his hands to grab Suspect Stults' right arm and pull it behind his back. Deputy Garay thought Suspect Stults "tensed" his body as he did so. Deputy Garay believed Suspect Stults was trying to "keep his hands away" from himself and Deputy [redacted] **[Garay's trascripts, page 28]**. Once Suspect Stults' right arm was behind his back, Deputy Garay immediately handcuffed it. Deputy [redacted] was unable to get Suspect Stults' left arm behind his back. Deputy Garay threatened to "tase" Suspect Stults. Suspect Stults immediately placed his left arm behind his back. Deputy Garay handcuffed Suspect Stults' left wrist.

Deputies Garay and [redacted] helped Suspect Stults to his feet and escorted him to their patrol vehicle. Deputy Garay asked Suspect Stults why he was avoiding detention. Suspect Stults indicated he had a warrant for his arrest **[Garay's transcript, page 20]**.

Suspect Stults did not complain of pain and Deputy Garay did not see any injuries on Suspect Stults. Sergeant Marion responded to the scene and the use of force was reported to him. At no time did Deputy Garay hear Suspect Stults cry out in pain, or hear the sound of a bone breaking. Deputy Garay did not repeatedly drive his knee into Suspect Stults' back, nor did Deputy [redacted]

Deputy Garay believed they were able to get Suspect Stults handcuffed quickly and there was no need to call for backup or assistance. It would not have made any difference, as the incident was over quickly **[Garay's transcripts, page 35]**.

Deputy Garay was read the video admonishment, and he viewed the "Front Door" video **[EXHIBIT C]**. Deputy Garay initially thought he exited the patrol vehicle and walked around the rear when they stopped on Avenue J. After reviewing the video, he realized he exited the patrol vehicle and walked around the front of the vehicle, just prior to making contact with Suspect Stults.

EMPLOYEE WITNESSES:

None.

NON-EMPLOYEE WITNESSES:

None.

Suspect Laurence Stults

Watch Commander Interview

On, February 13, 2020, Lieutenant Thomas Bruner, #[redacted] interviewed Suspect Stults on video. The video recorded interview was included in **EXHIBIT C**, in the folder labeled "Watch Commander Interview." The following is a summary of the interview.

Suspect Stults stated he was riding down the street when deputies shined a light on him. He "took off" on the bike. Suspect Stults crossed the street, stopped, and said, "Okay, okay, okay." He got down on the ground. The deputies reached and grabbed his left hand, placing it behind his back. A deputy then kneed him on his right side.

The deputies subsequently grabbed his right hand and kneed him on the back. Suspect Stults said the knee was not placed behind his back to hold him down

and reiterated the deputies kneed him twice. Suspect Stults denied resisting deputies.

Suspect Stults stated he used "meth" earlier in the day.

IAB Interview

On February 14, 2020, IAB investigators interviewed Suspect Stults. The interview was audio and video recorded. The video recorded interview can be found in **[EXHIBIT C]**, in the folder labeled "IAB Interview."

Suspect Stults stated he was riding his bicycle south on Andale Avenue toward Avenue J. A patrol vehicle approached him and shined a light on him so he "took off" **[Stults' transcript, page 2]**. A deputy ran on foot, while another deputy followed in a patrol vehicle.

Suspect Stults crossed Avenue J, at which time the deputies caught up to him. Suspect Stults was not sure when, or if, the second deputy got back into the patrol vehicle. Suspect Stults stopped and dismounted his bicycle. He said, "Okay, okay. You got me," and laid down on the ground **[Stults' transcripts, page 5]**.

When Suspect Stults laid down, his right hand was underneath his body and his left hand was next to him. One of the deputies called him a "fucking punk" or said something similar to "fuck you." As the deputy made those statements, the deputy grabbed his left arm, placed it behind his back, and kneed him twice on the right side of his back. Suspect Stults described being kneed in the back as "pushing down hard" on his back. The deputy got up, then put force on his back. Suspect Stults did not believe the deputy set his knee on him just to hold him down. When the deputy kneed him the first time, Suspect Stults heard something "crack or pop." Suspect Stults did not know which deputy kneed him **[Stults' transcripts, pages 7-9]**. After being kneed the second time, Suspect Stults was handcuffed.

Suspect Stults remained on the ground after being handcuffed. The deputy kept his knee on Suspect Stults' back. Suspect Stults told the deputies, " Come on, I can't breathe, I can't breathe." The deputies held Suspect Stults on the ground as he tried to "grasp" his breath **[Stults' transcripts, Page 11]**. Once he was taken to the patrol vehicle, Suspect Stults asked the deputies why they kneed him on the back. The deputies denied kneeing him.

Suspect Stults admitted he smoked methamphetamine the morning before the incident. He also admitted to possessing methamphetamine the night of the incident, but stated he didn't remember he had it on him. Suspect Stults was aware he had a warrant for his arrest, which may have factored into him fleeing deputies.